



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Marin Organic Certified Agriculture (MOCA)
Est. Number:	N/A
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Auditor(s):	Miguel A. Caceres
Program:	USDA National Organic Program (NOP)
Audit Date(s):	January 30 – May 3, 2007
Audit Identifier:	NP7030MMA
Action Required:	Yes
Audit Type:	Surveillance - Accreditation Renewal Audit
Audit Objective:	To verify continuing compliance to the audit criteria
Audit Criteria:	7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006
Audit Scope:	MOCA's quality manual dated December 2003, including personnel, processes, procedures, facilities, and related records
Location(s) Audited:	MOCA office located in Novato, CA; Clark Summit Farm, Tomales, CA; Marin Roots Farm, Petaluma, CA; and Cowgirl Creamery, Point Reyes Station, CA.

The 5 Year Accreditation Audit process started on January 30, 2007 with a review of the documents submitted by MOCA and culminated with the on-site surveillance audit which was conducted on May 1 – 3, 2007. Information received from MOCA indicated there were 44 crops, 0 wild crops, 7 livestock, and 2 handlers in the certification program. At the time of the audit, there were two of the livestock operations in transition. There were no conversions using 80/20 rule of conversion as all were feeding 100 percent organic feed.

The MOCA organic certification program is operated with a staff of five. The staff consists of 1 Agricultural Commissioner/Director of Weights and Measures, 1 Deputy Agricultural Commissioner/Deputy Director of Weights and Measures, 1 Inspector III/MOCA Program Coordinator, 1 Inspector II, and 1 Inspector Trainee. When a file is received, it is assigned to one of the 3 staff inspectors to review for completeness and compliance. The same inspector will conduct the inspection after which the Agricultural Commissioner or the Deputy Agricultural Commissioner will make the



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certification decision. All certification decisions for the previous year had been made by the Deputy Agricultural Commissioner. A review of the staff's education, training and experience records indicated that the personnel had the necessary minimum qualifications for their job duties and do not provide consulting services.

The three witness inspections covered three of the four categories of accreditation: crops, livestock, and handlers. There were no wild crop operations certified by MOCA. The National Organic Program website listing of accredited certifying agents does not include wild crop as a scope of accreditation for MOCA. A review of the original accreditation report (*NP1362DA NC MOCA NOP Final Report 01-14-02*) and discussions with the auditor of record and the MOCA Program Coordinator indicated that wild crops should have been included in the scope of accreditation and the website will need updating.

The review of the organic system plans and interviews conducted revealed the following:

- Applicants are provided with the informational document "*Organic Label Requirements for Crops*" which gives general information on the labeling requirements. They are also provided with "*Organic Invoice Label Requirements*" which gives information on what must be contained on the organic invoices. This is a California Department of Food and Agriculture (CFDA) requirement not a MOCA program requirement;
- Traceability of organic products received by certified operations were to the NOP standards; and
- Organic system plans require that information is provided on crop rotations.

FINDINGS

Observations made, interviews conducted, and procedures and records reviewed verified that MOCA is currently operating in compliance to the audit criteria except as noted below. There were four non-compliances identified during the audit.

NP7030MMA.NC1 – NOP §205.103(a) states, "A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic..." (b) Such records must: (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited." *There were no production records maintained by the poultry operation that was visited and none required of the applicant by MOCA. During the witness inspection the audit trail conducted on the eggs sold was based on estimates of how many hens the operations had at the time and how many eggs may have been harvested.*

NP7030MMA.NC2 – NOP §205.105 states, "To be sold or labeled as "100 percent organic," "organic," or "made with organic..." must be produced and handled without the use of: (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605." *The Marzyme Supreme product used by a processor was not properly reviewed and included the ingredients Sodium Benzoate and Caramel Color. Sodium Benzoate is not included in the National List and the Caramel Color was not verified as being obtained from a non-synthetic source.*



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NP7030MMA.NC3 – NOP §205.403 (c)(1) states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§ 205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and (3) That prohibited substances have not been and are not being applied to the operation through means which...” *The witness inspections conducted verified that not all of the information required to be verified during the inspections was in fact verified. On the first 2 witness inspections, the inspectors did not verify with the client that the organic system plans accurately reflected the practices in use since they were not reviewed with the applicants. Additionally, during the witness inspections of the applicants:*

- *none of the storage areas or the barn were inspected;*
- *field number 2 where the organic system plan indicated potatoes were planted was not visited;*
- *the insides of the hen houses were never observed;*
- *the entire 160 acres that were certified were not observed; and*
- *the Ingredients used for the processor were not properly reviewed and resulted in the processor using a culture which contained milk that was not verified as certified organic.*

NP7030MMA.NC4 – NOP §205.504 states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... (a) Personnel. (1) A copy of the applicant’s policies and procedures for training, evaluating, and supervising personnel.” *The MOCA procedures do not address procedures for evaluating the management team that makes the certification decision. Evaluation procedures only address conducting performance evaluations of inspectors.*